

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA

CASE NO. **3 : 16 cr - 159**  
**WALTER HERBERT RICE**

Plaintiff,

INDICTMENT

18 U.S.C. § 2252(a)(4)(B) and (b)(2)  
18 U.S.C. § 2252(a)(2) and (b)(1)

TIMOTHY WRIGHT

FORFEITURE

Defendant.

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THE GRAND JURY CHARGES THAT:

**COUNT 1**

On or about June 30, 2013 through on or about July 24, 2015, in the Southern District of Ohio, the defendant, **TIMOTHY WRIGHT**, knowingly possessed one or more books, magazines, periodicals, films, videotapes, and other matters which contained a visual depiction that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, and transported by any means, including by computer, in and affecting interstate and foreign commerce, and the production of such visual depictions involved the use of a prepubescent minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct, and such visual depiction was of such conduct.

At the time **TIMOTHY WRIGHT** possessed such matters, he had been convicted of a prior offense under the laws of the State of Ohio relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or the production, possession, receipt, mailing, sale, distribution, shipment, and transportation of child pornography, namely:

On or about October 2, 1996, in the Greene County, Ohio, Court of Common Pleas Case Number 1996CR0343 of "Illegal Use of a Minor in Nudity-Oriented Materials."

In violation of 18 U.S.C. § 2252(a)(4)(B) and 2252(b)(2).

**COUNT 2**

On or about August 20, 2014, in the Southern District of Ohio, the defendant, **TIMOTHY WRIGHT**, knowingly distributed any visual depiction, using any means or facility of interstate and foreign commerce and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed, shipped, and transported by any means including by computer, and the production of such visual depiction involved the use of a prepubescent minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct, and such visual depiction was of such conduct.

At the time **TIMOTHY WRIGHT** distributed such matters, he had been convicted of a prior offense under the laws of the State of Ohio relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or the production, possession, receipt, mailing, sale, distribution, shipment, and transportation of child pornography, namely:

On or about October 2, 1996, in the Greene County, Ohio, Court of Common Pleas Case Number 1996CR0343 of "Illegal Use of a Minor in Nudity-Oriented Materials."

In violation of 18 U.S.C. § 2252(a)(2) and 2252(b)(1).

**FORFEITURE**

Upon conviction of any offense alleged in Counts One through Two of this Indictment, the defendant, **TIMOTHY WRIGHT**, shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a): (1) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18 of the United States code, (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense and any property traceable to such property, including, but not limited to, the following:

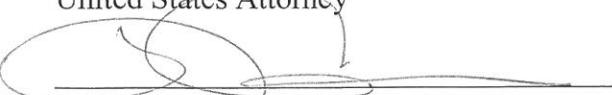
- a. Samsung Galaxy S6 cellular telephone, SM-G920P, FCCID A3LSMG920P with otter box; and,
- b. Dell Inspiron 15 laptop, Serial No. 3CPH1X1 with power cord.

All pursuant to 18 U.S.C. §2253(a)(1)-(3).

A TRUE BILL

*B/signed*  
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F O R E M A N

BENJAMIN C. GLASSMAN  
United States Attorney

  
LAURA I. CLEMMENS  
Deputy Criminal Chief